Karen Brinkmann Direct Dial (202) 637-2262 e-mail: karen.brinkmann@lw.com

LATHAM & WATKINS LLP

November 10, 2005

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary Federal Communications Commission 445 Twelfth Street, SW Washington, DC 20554

Re: <u>CC Docket 01-92 – Ex Parte Presentation</u>

555 Eleventh Street, N.W., Suite 1000

Tel: (202) 637-2200 Fax: (202) 637-2201

New York

Paris San Diego

Northern Virginia

Orange County

San Francisco

Silicon Valley

Washington, D.C.

Shanghai

Singapore

Tokyo

Washington, D.C. 20004-1304

FIRM / AFFILIATE OFFICES

www.lw.com

Boston

Brussels

Chicago

Frankfurt

Hamburg

Milan

Moscow

New Jersev

Hong Kong London

Los Angeles

Dear Ms. Dortch:

On November 8, 2005, Brenda Gerstemeier of Consolidated Communications and John McCallister of CenturyTel, Inc. and I made a presentation on the issue of phantom traffic to Tamara Preiss, Steve Morris, Jay Atkinson and Randy Clarke of the FCC's Wireline Competition Bureau Pricing Policy Division. The presentation described some of the causes of phantom traffic, and urged prompt adoption of rules to facilitate proper identification of carriers and jurisdictional classification of traffic, so telecommunications carriers can bill and collect lawful access charges and reciprocal compensation for termination of telecommunications traffic. Possible rule changes to ensure proper labeling and routing of telecommunications traffic were discussed. The need for FCC enforcement also was discussed. The parties expressed their intention to submit written suggestions for rules to fulfill these concepts, which will be filed in this docket.

Very truly yours,

/s/ Karen Brinkmann

cc: Tamara Preiss Steve Morris Jay Atkinson Randy Clarke